

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Valerie Jones,

Debtor.

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:
:

Chapter 13

Bankruptcy No. 18-13620-elf

DEBTOR'S RESPONSE TO MOTION FOR RELIEF
FILED BY BANK OF AMERICA, N.A.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part, denied in part. It is admitted that Debtor was delinquent in her post-petition payments as of the date the instant motion was filed. However, it is denied that the arrearage is still outstanding as Debtor has remitted payment in the amount of \$429.66 on March 18, 2019 directly to Bank of America. A true and correct copy of the payment is attached hereto as Exhibit "A". Said payment represents the January and February payments due on the account.
7. Debtor is without sufficient knowledge to form a belief as to the accuracy of this allegation and as such it is denied.
8. Debtor is without sufficient knowledge to form a belief as to the accuracy of this allegation and as such it is denied.
9. Denied. Debtor has made all payments due on the account and as such movant's interest in the vehicle is adequately protected. Moreover, Debtor has maintained insurance on the vehicle.

WHEREFORE, Debtor respectfully requests that the Court deny the Motion.

Dated: 03/20/2019

Respectfully submitted,

PATRICIA M. MAYER, P.C.

/s/ Patricia M. Mayer
Patricia M. Mayer, Esquire
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Counsel for Debtor

DEALER FINANCE S IC PAYMENT -\$429.66

TD BANK NA ZELLE \$500.00

VISA DDA PUR
444500 BOSTON MARKET 0154 -\$11.37
LANGHORNE * PA

MAR 18, 2019

DEPOSIT \$373.00

VISA DDA PUR
443106 DUNKIN 339621 Q35 -\$2.64
FAIRLESS HILL * PA

DDA PURCHASE *9505
03333049 STADIUM BAR GRILLE -\$37.90
19 FAIRLESS HILL * PA

VISA DDA PUR